

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

*People of the State of California, et al.,*

v.

*Meta Platforms, Inc., Instagram, LLC, Meta  
Payments, Inc., Meta Platforms Technologies,  
LLC.*

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IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:  
4:23-cv-05448

Case Nos.: 4:23-cv-05448-YGR  
4:22-md-03047-YGR

MDL No. 3047

**STATE ATTORNEYS GENERAL'S  
MOTION FOR EXTENSION OF TIME**

Pursuant to Local Rule 6-3, the State Attorneys General Plaintiffs (State AGs) respectfully request a seven-day extension of time, to and including April 18, 2025, for their deadline to move to compel a response to an outstanding Rule 45 subpoena issued to Mindshare Media, Ltd. (Mindshare). There is good cause for this request, as set forth below.

The State AGs served a Rule 45 subpoena on third-party company Mindshare on March 11, 2025. To serve the subpoena, the State AGs retained a process server who provided an affidavit of

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1 service attesting that Mindshare was served at the address of its corporate registered agent,  
2 Corporate Creations Network, Inc. The State AGs did not receive a timely response to this  
3 subpoena, and so contacted Mindshare on April 8, 2025, to inquire as to the status of a response.  
4 The State AGs received a response from Mindshare's counsel the same day, and the parties were  
5 able to discuss the parameters of the subpoena and the potential timing of a production. Mindshare's  
6 counsel represented, however, that Mindshare had no record of receiving the subpoena, and  
7 indicated that although objections would be forthcoming, Mindshare's counsel agreed to discuss  
8 the production of certain documents with her client.

9 Today, on April 11, the State AGs received correspondence from Mindshare's counsel  
10 stating that Mindshare believes it was never properly served with the subpoena and thus is under  
11 no obligation to respond. The State AGs require additional time to investigate this assertion,  
12 including contacting their process server, to assess whether Mindshare's objection is appropriate  
13 and to evaluate next steps.

14 A seven-day extension is reasonable and will not prejudice any party or the Court. The State  
15 AGs properly served Meta with notice of the subpoena on March 10, 2025, and Meta did not object.  
16 There is no trial currently set, and a brief extension of this deadline will not affect the other  
17 deadlines in this case.

18 To the contrary, the State AGs would be prejudiced if the extension were not granted. The  
19 State AGs believe that Mindshare—which the State AGs understand formerly worked with Meta  
20 to place Meta's advertisements and branding into the public sphere—possesses information that is  
21 highly relevant to the claims in this case, including data on the scope, frequency, and targeting of  
22 its advertising. This information is directly relevant to both the State AGs' deception claims and  
23 potential relief. The State AGs reasonably believed that the subpoena was properly served within  
24 the fact discovery period, and only learned today that Mindshare believes it was not properly served  
25 with the subpoena.

1           The State AGs are filing this motion in lieu of a stipulation because: (1) Mindshare's  
2 counsel has not received confirmation of Mindshare's position on the requested extension from her  
3 client and so was unable to agree to a stipulation; (2) Mindshare's counsel is not admitted to practice  
4 in the Northern District of California; and (3) Mindshare takes the position that, because it believes  
5 it was not properly served with the subpoena, it is not proper for Mindshare to file a stipulation  
6 with this Court. Due to timing of this issue and the end of fact discovery, the State AGs are filing  
7 the motion today, in an abundance of caution.

8           The State AGs thus respectfully seek a brief extension, to and including April 18, 2025, to  
9 preserve their ability to move to enforce the subpoena or to take other steps to obtain the information  
10 they are seeking as appropriate.

11  
12 Dated: April 11, 2025

Respectfully submitted,

**ROB BONTA**

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**ATTESTATION**

I, Megan O'Neill, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 11, 2025

By: /s/ Megan O'Neill

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via CAND/ECF on all parties of record and further certifies that the foregoing was served via electronic mail on April 11, 2025, to the following Counsel for Mindshare Media, at:

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Dated: April 11, 2025

By: /s/ Megan O'Neill